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March 14, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. James R. Cho, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 11D South  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, *et al.***  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**

Dear Judge Cho:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case.

On February 27, 2025, Plaintiff informed the Court that, on February 27, 2025, it re-served the subpoenas on the non-party observers, Christian Hogarth, Fari Gutierrez, Lizbeth Medina, Mark Purficati, and Sara Gonzalez and filed declarations of service. To date, none of the non-party observers have complied with the subpoenas. Accordingly, Plaintiff respectfully requests that pursuant to 28 U.S.C. § 636(e), the Court certify to Judge Chen the facts surrounding the contempt by non-party observers, Christian Hogarth, Fari Gutierrez, Lizbeth Medina, Mark Purficati, and Sara Gonzalez.

Dated: Lake Success, New York  
March 14, 2025

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York  
March 14, 2025

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF)